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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:21-cr-00429-YGR
)	
Plaintiff,)	DECLARATION OF JENNIFER SERINO IN
)	SUPPORT OF UNITED STATES' OPPOSITION
v.)	TO DEFENDANT'S MOTION FOR NEW
)	TRIAL
RAY J. GARCIA,)	
)	
Defendant.)	Date: March 15, 2023
)	Time: 2:00 pm
)	Honorable Yvonne Gonzalez Rogers

I, Jennifer Serino, declare as follows:

1. I am Senior Special Agent (SSA) with the Department of Justice Office of Inspector General (DOJ OIG) and have been since March 2020. I have been a special agent with DOJ OIG since September 2015. As a DOJ OIG Special Agent, I have investigated various federal crimes, including computer crimes, crimes involving fraud, public corruption, and civil rights. I am the lead DOJ OIG case agent assigned to the investigation of sexual abuse of female prisoners at the Federal Correctional Institution (FCI) Dublin by the former warden, Ray J. Garcia.

1 2. During the investigation and prosecution of Garcia, I received information that members of the
2 defense team had contacted Bureau of Prisons (BOP) employees to discuss this case. On September 2,
3 2022, agents with the DOJ OIG and Federal Bureau of Investigation (FBI) spoke with Garcia's former
4 secretary at FCI Dublin, Alexis Valdez, who indicated that Garcia's attorney had previously contacted her
5 to discuss this case.


6 3. On November 10, 2022, I spoke with another BOP employee, Joshua Brown, who informed me
7 that Garcia's wife asked him if he would be willing to speak with the defense investigator regarding the
8 case. On November 22, 2022, Brown informed me that Garcia's defense investigator had contacted him
9 directly on his cellphone earlier that day.

10 4. On December 1, 2022, I received an email that was forwarded to me by FCI Dublin Special
11 Investigative Agent (SIA) Stephen Putnam. The email was from an FCI Dublin employee, Hector
12 Martinez, who had informed SIA Putnam that on the evening of November 30, 2022, he received a call
13 on his home telephone from Garcia's defense investigator. The employee reported that the defense
14 investigator "aggressively" questioned him about the case and asked for information related to Victim 1
15 (Melissa).

16 5. In addition to contacting BOP employees, I also received information that Garcia's defense
17 investigator coordinated to meet with three FCI Dublin inmates to discuss this case. Specifically, on
18 November 28, 2022, the defense investigator emailed an FCI Dublin employee and arranged to meet with
19 three FCI Dublin prisoners on December 1, 2022. It is my understanding that these meetings did not
20 occur.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
22 accurate to the best of my knowledge.

23 Executed this 23rd day of February, 2023, in San Diego, California.

24
25 
26 JENNIFER SERINO
27 Senior Special Agent
28 Department of Justice Office of Inspector General